

Example Initial Notification
Paint Stripping and Miscellaneous Surface Coating Area Sources
National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart HHHHHH
40 CFR §§ 63.11169-63.11180
(Example Format as of December 14, 2009)

This example format may be used to meet the Initial Notification requirements of Subpart HHHHHH; however, you are not required to use this format as long as you provide the information required by 40 CFR § 63.11175(a). This example format for the Initial Notification may also serve as the Notification of Compliance Status as provided for under 40 CFR § 63.11175(a)(8). A copy of the brochure on this regulation is located at http://www.epa.gov/ttn/atw/area/paint_stripb.pdf

1. **Company Name** NORTHEAST AUTO BODY, LLC
Facility Name (if different) _____

2. **Information about the owner and operator:**

a. **Owner's Name and Title** ALAN HAWTHORN
Owner's Street Address 12018 ALBERTA DR. PHILA, PA 19154
Street City State Zip
Owner's Telephone Number 267-767-9525
Owner's E-mail Address (if available) neautobody@aol.com

☒ **Owner's Signature** 

Is the Operator the same person as the Owner? Yes ☒ No ☐

If the Operator information is different, please provide the following:

b. **Operator's Name and Title** _____
Operator's Street Address _____
Street City State Zip
Operator's Telephone Number _____
Operator's E-mail Address (if available) _____
Operator's Signature _____

Is the Certifying Company Official different from the above owner and/or operator? Yes ☐ No ☒

If the Certifying Company Official information is different, please provide the following:

c. **Certifying Company Official's Name and Title** _____
Certifying Company Official's Address _____
Street City State Zip
Certifying Company Official's Telephone Number _____
Certifying Company Official's E-mail Address (if available) _____
Certifying Company Official's Signature _____

Example Petition for Exemption

Paint Stripping and Miscellaneous Surface Coating Operations

Area Source Rule

40 CFR Part 63 Subpart HHHHHH (§§ 63.11169 – 63.11180 and Table 1)

An exemption from the requirements of Subpart HHHHHH is case/fact specific. This Example Petition for Exemption is completed to illustrate the type of information that you might submit to request an exemption. You may use your own form as long as you include all the information required by the rule for a petition. We will respond to your petition after we have evaluated the information you provided.

In accordance with 40 CFR §63.11170(a)(2), an owner or operator of a motor vehicle or mobile equipment surface coating operation (including refinishing operations) may petition the United States Environmental Protection Agency (EPA) Administrator to exempt the operation from the surface coating regulatory requirements of 40 CFR Part 63 Subpart HHHHHH, if the owner or operator can demonstrate that the spray-applied coatings used by the facility do not contain target hazardous air pollutants (HAP) (paint stripping requirements still apply).

Note: in determining whether you spray apply target HAP containing coatings, do not include coatings applied using hand-held aerosol cans, or hand-held devices (e.g., spray guns) with a paint cup capacity of 3 fluid ounces or less. These are not considered spray-applied coatings under the rule. See, "spray-applied coating operations" definition at 40 CFR §63.11180.

As defined in 40 CFR §63.11180, coatings are "target HAP containing coatings" if they contain compounds of chromium (Cr), lead (Pb), nickel (Ni), cadmium (Cd), or manganese (Mn) above a given concentration. If a compound is not carcinogenic, then the rule allows a higher concentration of the compound before the coating is considered to be a target HAP containing coating, as described here:

- Coatings containing compounds of chromium (e.g., chromates) including hexavalent chromium (Cr+6) or trivalent chromium (Cr+3), lead (Pb), nickel (Ni), cadmium (Cd), or manganese (Mn) that are carcinogens and are present at more than 0.1% of the coating by mass are target HAP containing coatings.
- Coatings containing compounds of trivalent chromium (Cr+3) or manganese (Mn) that are not carcinogens, and are present at more than 1.0% of the coating by mass are also target HAP containing coatings.
- Refer to the coating Material Safety Data Sheets (MSDS) or obtain documentation from your supplier for each coating that you spray apply without mixing. If you mix coatings prior to application, determine the target HAP concentration for each coating mixture that you spray apply.

1. General Information

Company Name NORTHEAST AUTOBODY LLC

Facility Name _____

Mailing Address 2501 ORTHODOX ST. Telephone Number 215-533-6502

City PHILADELPHIA State PA Zip 19137

Facility Location (if different from above):

For mobile refinishing operations, indicate "at various customer locations"

Street Address _____ County _____

City _____ State _____ Zip _____

Location where your facility compliance records are maintained:

Street Address SAME AS ABOVE County _____

City _____ State _____ Zip _____

3. **The street address (physical location) of the affected source**

2501 ORTHODOX ST. PHILA. PA 19137
Street City State Zip

Are the compliance records located at the same location? Yes ☒ No ☐

If the compliance records are kept at a different location, please provide the address where the compliance records are kept:

Street City State Zip

Is the source a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location? Yes ☐ No ☐

If so, please provide the address where the compliance records are kept:

Street City State Zip

4. **Identification of Standard (check this box):**

N/A ☐ Yes, I am subject to 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Source; Final Rule

5. **A brief description of the type of operation:**

For Surface Coating Operations

a. The source is a: (check all that apply)

- ☒ Motor Vehicle Surface Coating Operation
☐ Mobile Equipment Surface Coating Operation
☐ Miscellaneous Surface Coating Operation

b. Number of spray booths 1

c. Number of preparation stations 0

d. Number of painters usually employed at the operation 1

For Paint Stripping Operations

a. Methods of paint stripping used (check all that apply)

☐ Chemical ☐ Mechanical ☒ Other (please describe) DO NOT STRIP

b. Substrates stripped (check all that apply)

☐ Wood ☐ Plastic ☐ Metal ☒ Other (please describe) N/A

6. **Methylene Chloride (MeCl) Used In Paint Stripping Operations**

Do you plan to use more than 1 ton of Methylene Chloride annually after the compliance date specified for your new or existing source in item 7? Yes ☐ No ☒

7. **Compliance Status For Paint Stripping Operations Using Methylene Chloride (check one)**

For paint stripping operations using Methylene Chloride (any amount), the relevant requirements that you must evaluate in making this determination are specified in 40 CFR § 63.11173(a) through (d) of this subpart.

- N/A ☐ This source is already in compliance with each of the relevant requirements
☐ This source will come into compliance with each of the relevant requirements by the compliance date

Compliance Status For Surface Coating Operations (check one)

For surface coating operations, the relevant requirements are specified in 40 CFR § 63.11173(e) through (g) of this subpart.

- ☐ This source is already in compliance with each of the relevant requirements
- X ☒ This source will come into compliance with each of the relevant requirements by the compliance date

Compliance dates are as follows (as specified in 40 CFR §63.11172):

New source (initial startup after January 9, 2008) compliance date is date of initial startup

New source (initial startup after September 17, 2007 but before January 9, 2008)
compliance date is January 9, 2008

Existing source (initial startup before September 17, 2007) compliance date is January 10, 2011

Note: As defined in 40 CFR §63.11180 Initial startup is the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

8. Certification of Compliance Status

(Complete the one that applies to your source either A, B or C)

Note: An Annual Notification of Changes Report as described in 40 CFR §63.11176(a) is required by March 1, for each calendar year in which information previously submitted has changed, or if there have been any deviations from the requirements.

A. This source is a new source. I certify the truth, accuracy, and completeness of this notification, and that this source has complied with all of relevant standards of this subpart, and that **this initial notification also serves as a notification of compliance status.**

Print responsible official's name: _____ Title: _____

Phone number: _____ E-mail Address (if available) _____

Signature of responsible official: _____ Date: _____

B. This source is an existing source. I certify the truth, accuracy, and completeness of this notification, and that this source has complied with all of relevant standards of this subpart, and that **this initial notification also serves as a notification of compliance status.**

Print responsible official's name: _____ Title: _____

Phone number: _____ E-mail Address (if available) _____

Signature of responsible official: _____ Date: _____

X **C. This source is an existing source. I am submitting this form as an Initial Notification only.**

I understand a responsible company official has until March 11, 2011 to submit a Notification of Compliance Status certifying an existing source's compliance with all of the relevant standards and other requirements of this subpart as specified under 40 CFR § 63.11175(b)(1) – (4). I certify the truth, accuracy, and completeness of this notification, and that this source will be brought into compliance with all of relevant standards of this subpart by January 10, 2011.

Print responsible official's name: ALAN HAWTHORN Title: OWNER

Phone number: 215-533-6502 E-mail Address (if available) NEAUTOBODY@AOL.COM

Signature of responsible official: [Signature] Date: 1-20-10

2. Describe your surface coating operation and explain why your facility qualifies for the exemption under 40 CFR §63.11170 (a)(2). (For example: Our facility repairs automobile collision damage. We are seeking an exemption because we do not use any target HAP containing coatings.)

DO NOT USE / DO NOT STRIP

3. Description of Spray-Applied Coatings

Identify the manufacturer(s) and product line(s) of all the spray-applied coatings used at this facility. Attach additional pages to this petition, if necessary.

Manufacturer	Product Line
BASF CORP. DIMONT	BASE COAT / CLEAR COAT

4. Certification Statement

I have consulted reliable analyses (material safety data sheets or information obtained from the coating manufacturer) of the coatings that are used in this facility and have determined that we do not spray apply target HAP containing coatings as defined in 40 CFR §63.11180. Furthermore, I have verified that none of the coatings mixed prior to application contain target HAP as spray-applied, based on the definition of "target HAP containing coatings". I certify, under penalty of law, to the truth, accuracy, and completeness of the information provided in this petition. If circumstances change such that we intend to spray apply target HAP containing coatings in surface coating operations, we will submit the initial notification required by 40 CFR §63.11175 and will comply with the requirements of 40 CFR Part 63 Subpart HHHHHH (the National Emission Standard for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources). Spray application of target HAP containing coatings in a surface coating operation voids any exemption that might be granted as a result of this petition.

If your petition is approved, then you must keep a copy of the approval on site at your facility until you change your operation(s) to include spray application of target HAP containing coatings, or discontinue motor vehicle and mobile equipment surface coating operations.

Signature of Certifying Official

Date

ALAN HAWTHORN
215-533-6502

Printed Name and Telephone
Number of Certifying Official

Certifying official must be the
owner or operator of the facility.
Check the one or both that apply:

☒ Owner ☐ Operator

2501 ORTHODOX ST.

Mailing Address of Certifying Official

PHILA, PA 19137